

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America
v.
Edgar Eduardo QUIROZ-OTERO

Case No.

2:22-MJ-364

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 20, 2022 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

Title 21 USC 846

Conspiracy to possess with intent to distribute a controlled substance, to wit:
more than 400 grams of fentanyl.

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

VIA FACETIVE

Date: 05/20/2022

City and state: Columbus, Ohio



Complainant's signature

Clark S. Powers, Special Agent

Printed name and title

Judge's signature

Elizabeth Preston Deavers, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Homeland Security Investigations (HSI) Special Agent (SA) Clark S. Powers (your affiant),
Being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. Your affiant has been employed by HSI since December 2016, having been assigned to our Sells, Arizona office. During that time, your affiant was assigned to the Sells Border Enforcement and Security Task Force (BEST), which focused on human, narcotics, bulk cash, and weapon smuggling occurring between Ports of Entry (POE) and the Phoenix, AZ metropolitan area. Beginning in October 2020, your affiant was assigned to the HSI Columbus, Ohio office, as a participating member of the Central Ohio High Intensity Drug Trafficking Area (HIDTA) multi-agency task force. Your affiant gained experience through a Bachelor of the Arts Degree in Criminal Justice in 2007, completion of the Criminal Investigator Training Program (CITP) and completion of the HSI Special Agent Training Academy in 2017. During CITP and HSI Academy training, your affiant was instructed in all phases of criminal investigation such as: Criminal Law, Search and Seizure, Field Enforcement Techniques, Firearms Proficiency, and Interviewing and Evidence. Your affiant is responsible for enforcing federal criminal statutes including, but not limited to, controlled substance violations, pursuant to 21 U.S.C. §§ 841 and 846.

2. While employed as a Special Agent, your affiant has conducted and participated in numerous investigations of criminal activity, including, but not limited to, controlled substance violations. During the investigation of these cases, your affiant has executed, or participated in the execution of, numerous search warrants and seized evidence of these violations.

PURPOSE OF AFFIDAVIT

3. I am participating in an investigation concerning an organized group of known and unknown individuals, including Edgar Eduardo QUIROZ-OTERO (hereafter referred to as QUIROZ-OTERO), who are suspected of conspiracy to possess with intent to distribute more than 400 grams of fentanyl, in violation of 21 U.S.C. § 846.
4. The information set forth in this affidavit is based upon my knowledge, training, experience, and participation in investigations involving the smuggling, possession, distribution, and storage of narcotics and narcotics proceeds. This information is also based on the knowledge, training, experience, and investigations conducted by fellow law enforcement officers, who have reported to me either directly or indirectly. I believe this information to be true and reliable. I know it is a violation of 21 U.S.C. § 846 for any person to knowingly possess and/or conspire to possess with the intent to distribute a controlled substance.
5. The information set forth in this affidavit is based upon my personal participation in this investigation, information obtained from other agents and detectives assisting in this investigation, and my review of records, documents, and other material relating to this investigation.
6. Because this affidavit is being submitted for the limited purpose of securing criminal complaints and arrest warrants, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that QUIROZ-OTERO violated 21 U.S.C. § 846.

FACTS ESTABLISHING PROBABLE CAUSE

7. Based upon your affiant's training, experience, investigative trends, and conversations with other Special Agents and law enforcement officers, it is common for drug trafficking organizations (DTO) to utilize short-term rental properties, hotels, and mailbox stores to facilitate the trafficking of illegal narcotics and contraband. These methods minimize the DTO's residence from being compromised during the investigation and give the appearance of a legitimate parcel consignee address.
8. On May 20, 2022, HSI Special Agents (SA's) and Task Force Officers (TFO's) assigned to the Central Ohio High Intensity Drug Trafficking Area (HIDTA) Task Force reviewed source

information for short-term rentals in the Columbus, OH area. HSI SA's and TFO's discovered Edgar Eduardo QUIROZ-OTERO (hereafter referred to as QUIROZ-OTERO), phone number (702) 210-2105 was listed as the current renter of short-term rental property at 84 Meek Ave., Columbus, OH. In March 2022, the Central Ohio HIDTA Task Force investigated several DTO members who used the same address, 84 Meek Ave., and the investigation led the Task Force to seize several kilograms of fentanyl, heroin, and methamphetamine, which the DTO shipped via parcel delivery company next day air service.

9. HSI SA's and TFO's then searched law enforcement databases for subscriber information for the aforementioned phone number and found it was registered to Jose Montoya Soto, 2900 El Camino Ave., Apt. 41, Las Vegas, NV. SA's and TFO's attempted to find listings for QUIROZ-OTERO or Soto at 2900 El Camino Ave., but found no records that anyone with either name ever lived at the El Camino Ave. address. In your Affiant's training and experience, DTO members will often use fictitious names and addresses for cell phone subscriber information to avoid law enforcement detection. In addition, past Central Ohio HIDTA investigations have revealed that DTO's frequently distribute narcotics from the Las Vegas, NV area to the Columbus, OH area.

10. With the above information, HSI SA's and TFO's established surveillance in the area of 84 Meek Ave. At approximately 6:47 a.m. local time, HSI SA's and TFO's observed a United Parcel Service (UPS) van drive down Meek Ave. and park just south of 84 Meek Ave. Several minutes later, a UPS driver delivered the cardboard parcel box to the front porch of 84 Meek Ave. At approximately 6:51 a.m., SA's and TFO's observed a white Nissan Versa bearing Ohio temporary tag O004516 (hereafter referred to as **Target Vehicle**) parked at the 84 Meek Ave. residence. A Hispanic male, later identified as QUIROZ-OTERO, was sitting in the driver's seat, then exited **Target Vehicle**, walked to the front porch of 84 Meek Ave., retrieved the parcel and entered the residence. HSI SA's and TFO's then called for additional law enforcement officers to respond to the area of 84 Meek Ave., and the responding officers included an Ohio State Highway Patrol (OSHP) Trooper and K-9 handler.

11. At 7:34 a.m., QUIROZ-OTERO exited 84 Meek Ave. with a medium sized roller bag, which he placed in the trunk of **Target Vehicle**. QUIROZ-OTERO then got into **Target Vehicle** and departed the area. HSI SA's and TFO's, including OSHP Troopers, followed to conduct mobile surveillance. At approximately 7:44 a.m., an OSHP Trooper stopped QUIROZ-

OTERO in **Target Vehicle** near McKinley Ave. and N. Souder Ave. after the Trooper observed several moving traffic violations. OSHP Trooper Michael Rucker approached **Target Vehicle**, asked for QUIROZ-OTERO's identification, then placed QUIROZ in the back of the Trooper's OSHP cruiser. OSHP Trooper Rucker utilized his K-9 partner to conduct an open-air sniff of the **Target Vehicle**. The K-9 alerted to an odor he is trained to detect emanating from the trunk of the **Target Vehicle**. At approximately 7:55 a.m., OSHP Trooper Rucker found two kilograms of suspected fentanyl in the roller bag located in the trunk of **Target Vehicle**, which later field tested presumptive positive for fentanyl.

12. HSI SA's and TFO's seized the fentanyl, advised QUIROZ-OTERO of his Miranda rights, and placed him under arrest. SA's and TFO's transported QUIROZ-OTERO to the Columbus Division of Police Headquarters, located at 120 Marconi Boulevard, Columbus, OH, for additional questioning. Your affiant, along with Columbus Police Department (CPD) Detective Kevin George interviewed QUIROZ-OTERO. HSI New York SA Jose Maldonado is a native Spanish speaker and provided translation for the custodial interview. Investigators reminded QUIROZ-OTERO of his Miranda rights, which he again waived, agreeing to speak with investigators at that time. During the interview, QUIROZ-OTERO admitted he knew the package he retrieved from the porch of 84 Meek Ave. contained drugs. QUIROZ-OTERO stated he would be paid for successful delivery of the parcel. QUIROZ-OTERO did not know the specific payment amount he would receive but expressed that he knew it was "good money."

13. HIDTA TFO's later obtained a search warrant for 84 Meek Ave. and executed it at 12:03 p.m. During the search, investigators found a cardboard parcel box bearing a UPS shipping label from Antonio Toriz Santamaria, (702) 210-2127, 3600 N. Pecos Rd., Las Vegas, NV, to Aiden Eden Cortez Munoz, 84 Meek Ave., Columbus, OH. Inside the house, SA's and TFO's found an additional one kilogram of suspected narcotics, which later tested presumptive positive for cocaine, and bulk U.S. currency.

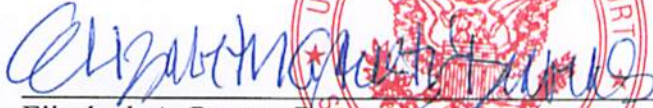
CONCLUSION

14. Based on the foregoing facts, your affiant believes that there is probable cause to believe that Edgar Eduardo QUIROZ-OTERO violated 21 U.S.C. § 846, conspiracy to possess with intent to distribute more than 400 grams of fentanyl. Accordingly, your affiant requests the issuance of a criminal complaint and arrest warrant for Edgar Eduardo QUIROZ-OTERO.



Special Agent Clark Powers
Homeland Security Investigations

Subscribed and sworn to before me this 23rd day of May, 2022.



Elizabeth A. Preston Deavers
United States Magistrate Judge

